



October 20, 2023

Ms. Jennelle Gonzalez *Email: jennelle_gonzalez@txs.uscourts.gov*
Case Manager to The Honorable Judge Charles Eskridge
United States District Court for the Southern District of Texas
515 Rusk Avenue, Courtroom 9F, Houston, Texas 77002

Re: Civil Action No. 4:22-cv-03705; *Spectrum Laboratories, LLC v. Does # 1-10* -
Subpoena from Plaintiff Spectrum Laboratories, LLC to URZ Trends, LLC –
Additional Discovery Issues

Dear Ms. Gonzales:

As this Court is aware, Plaintiff Spectrum Laboratories, LLC (“Spectrum”) has been seeking responsive documents from Defendant URZ Trendz, LLC (“URZ”) since May 16, 2023 that (a) identify URZ’s sales of Spectrum’s Quick Fix product and any counterfeit, and (b) identify how URZ obtained the Quick Fix (legitimate or counterfeit) that it sold. [See Doc. 55, Return of Service].

On September 5, 2023, following a Discovery Hearing held on August 29, 2023, the Court entered a Minute Entry and Order. [See Doc. 63, Minute Entry and Order]. In relevant part, the Minute Entry and Order provided that URZ was to produce “all documents (i) relating to any product that it identifies for sale or marketing with reference to the words “Quick Fix”; (ii) any external communications related to any product sold or marketed by anyone as “Quick Fix,” whether by Spectrum, URZ, or any other party; and (iii) any internal communications related to any product sold or marketed by anyone as “Quick Fix,” whether by Spectrum, URZ, or any other party. Production must be made by September 22, 2023.” [See *id.*].

On September 22, 2023, while URZ previously represented that it had no responsive documents, URZ produced six (6) pages of documents in response to this Court’s Minute Entry and Order. [See Exhibit A, Defendant – 0001-0006] (“URZ’s production”). URZ’s production is woefully insufficient and fails to comply with the Court’s Minute Entry and Order and thus, yet another follow-up discovery letter is necessary. Specifically, URZ has failed to comply with the following:

1. **All documents relating to any product that it identifies for sale or marketing with reference to the words “Quick Fix”;**
 - URZ produced two purported receipts from SNK for its purchase of approximately 808 Quick Fix products. However, URZ failed to produce Checks #185 and 186 relating to its payment for such products. [See Exhibit A, Defendant – 0001-0002]. Furthermore, while receipts are typically numbered chronologically, SNK’s receipts are not. SNK’s receipt #652649 is dated March 31, 2022, while SNK’s receipt #652650 is dated March 30, 2022. [See *id.*].





- URZ produced one invoice from Hookah G for its purchase of approximately 1,344 Quick Fix products. However, URZ failed to produce any documents evidencing any payment to Hookah G. [See Exhibit A, Defendant – 0003].
- URZ produced three pages of what appear to be sales/purchase reports of its sales/purchases to approximately 27 entities relating to approximately 2,431 Quick Fix products. [See Exhibit A, Defendant – 0004-0006]. However, URZ has failed to produce any sales, invoices or payment receipts for such transactions. [See *id.*]. And the reports are further deficient on their face because they do not provide sales/purchase date—content that would seemingly be standard for a sales/purchase report. It is for this reason that Spectrum requested that the native files be produced (instead of the six .pdfs provided), a request that has gone unanswered by URZ.
- URZ failed to produce any additional sales receipts to account for all of its sales of Quick Fix. For example, URZ sold approximately 112 Quick Fix products on March 3, 2023 under Receipt #100006864 yet failed to produce that sales receipt nor any other sales receipts. [See Doc. 59, pp. 9-10]. As the Court will recall, this information was obtained through a private investigator. [*Id.*].



2. **Any external communications related to any product sold or marketed by anyone as “Quick Fix,” whether by Spectrum, URZ, or any other party;**
 - No responsive documents have been produced by URZ.



3. Any internal communications related to any product sold or marketed by anyone as “Quick Fix,” whether by Spectrum, URZ, or any other party.

- No responsive documents have been produced by URZ.

On October 11, 2023, counsel for Spectrum conferred with counsel for URZ regarding the issues raised by this letter, which resulted in URZ responding on October 16, 2023 that “[t]he documents produced were full (not partial) production of documents ordered by the Court to be produced” and that “[t]here is nothing being withheld.” Then, on October 17, 2023, Spectrum requested that URZ produce the native versions of these files, some of which appear to be spreadsheets converted to .pdf. As of the time of this filing, Spectrum has not received a response. To that end, as Judge Eskridge predicted at the Discovery Hearing held on August 29, 2023, URZ’s production of documents will mirror that of an onion, where layer after layer will need to be peeled back in order to get to the heart of this dispute.

Spectrum respectfully requests another status conference to compel URZ’s compliance and to address its willful disobedience of the Court’s order and its discovery obligations, including imposition of appropriate sanctions¹ for URZ’s ongoing lack of compliance.

Very truly yours,
/s/ David Cupar
David Cupar, Lead Counsel for Plaintiff

¹ On June 16, 2023, this Court entered an Order on Spectrum’s discovery letter, admonishing URZ that the Court “will not hesitate to impose sanctions for willful disobedience of this order and/or discovery obligations.” [See Doc. 53, Order].

SNK creation.

01-11

A

652649

SNK Creation

CUSTOMER'S ORDER NO.	DEPARTMENT	DATE 3-31-22
NAME UR 2. Trenz.		
ADDRESS		
CITY, STATE, ZIP		

SOLD BY	CASH	C.O.D.	CHARGE	ON. ACCT.	MDSE. RETD.	PAID OUT
---------	------	--------	--------	-----------	-------------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1 112	Quirk Frz	4.25	476.00
2 12	Quirk Frz Pro	12.50	150.00
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			

3/31/22
\$ PAID
 626.00
 Check # 186

626.00

RECEIVED BY



Hookah G
2641 South Hill Street
Los Angeles, CA 90007
213-749-1430

INVOICE Sent

Bill To**URZ Trendz**

URZ Trendz
7400 Harwin Dr. # 120
Houston, TX 77036
832-277-0192

Ship To**URZ Trendz**

URZ Trendz
7400 Harwin Dr. # 120
Houston, TX 77036
832-277-0192

Details

Invoice No. : INV-003736
Invoice Date : Feb 22, 23
Order No. : SO-003781
Due Date : Feb 22, 23
Sales Rep :
Terms :

Item	Quantity	Price	Amount
Yin Yang Kratom White Vein Maeng Da 40 Ct	315 PC(s)	\$2.75	\$866.25
Yin Yang Kratom White Vein Maeng Da 75 CT	240 PC(s)	\$4.00	\$960.00
Yin Yang Kratom White Vein Maeng Da 150 CT	320 PC(s)	\$7.00	\$2240.00
Yin Yang Kratom Green Vein Borneo 150 CT	320 PC(s)	\$7.00	\$2240.00
Yin Yang Kratom White Vein Maeng Da 300 CT	150 PC(s)	\$12.00	\$1800.00
Yin Yang Kratom Green Vein Borneo 300 CT	150 PC(s)	\$12.00	\$1800.00
Yin Yang Kratom Red Vein Bali 300 CT	150 PC(s)	\$12.00	\$1800.00
Yin Yang Kratom White Vein Maeng Da 500 CT	144 PC(s)	\$18.00	\$2592.00
Yin Yang Kratom Green Vein Borneo 500 CT	144 PC(s)	\$18.00	\$2592.00
Yin Yang Kratom Red Vein Bali 500 CT	96 PC(s)	\$18.00	\$1728.00
Yin Yang Kratom White Vein Maeng Da 200 g	320 PC(s)	\$9.00	\$2880.00
Yin Yang Kratom Green Vein Borneo 200 g	160 PC(s)	\$9.00	\$1440.00
Yin Yang Kratom Red Vein Bali 200 g	160 PC(s)	\$9.00	\$1440.00
Yin Yang Kratom White Vein Maeng Da 500 g	192 PC(s)	\$16.00	\$3072.00
Yin Yang Kratom Green Vein Borneo 500 g	144 PC(s)	\$16.00	\$2304.00
Yin Yang Kratom Red Vein Bali 500 g	96 PC(s)	\$16.00	\$1536.00
Quick Fix	1344 PC(s)	\$4.25	\$5712.00
Total Items: 17	Total Quantity:	4445	Sub Total
			\$37002.25

TERMS & CONDITIONS

Bank Of America's account # 325037005753
Account Name: Ballaj DBA Hookah G
Thank for your business

Shipping Charges \$77.75

Total \$37080.00

Balance Due \$37080.00

DEFENDANT - 0003

068536724913

JOE SMOKE	QUICK FIX PRO	4	50.00	60.00	10.00	17 %
CLOUD CHASERZ MONTROSE	QUICK FIX PRO	6	75.00	90.00	15.00	17 %
CLOUD CHASERZ SHERIDAN	QUICK FIX PRO	2	25.00	30.00	5.00	17 %
CLOUD CHASERZ 71ST	QUICK FIX PRO	2	25.00	30.00	5.00	17 %
CLOUD CHASERZ SAPULPA	QUICK FIX PRO	2	25.00	30.00	5.00	17 %
NUMBER 1 SMOKE SHOP	QUICK FIX PRO	2	25.00	30.00	5.00	17 %
Total Of Product = 068536724913		18	\$225.00	\$270.00	45.00	

DEFENDANT - 0004

674008320028

RISING WHOLESALE INC	QUICK FIX	224	952.00	1,008.00	56.00	6 %
Galaxy Wholesale	QUICK FIX	672	2,856.00	3,024.00	168.00	6 %
QUICK MART	QUICK FIX	9	38.25	45.00	6.75	15 %
CLOUD CHASERZ 71ST	QUICK FIX	70	297.50	385.00	87.50	23 %
NUMBER 1 SMOKE SHOP	QUICK FIX	2	8.50	11.00	2.50	23 %
CLOUD CHASERZ SAPULPA	QUICK FIX	14	59.50	77.00	17.50	23 %
CLOUD CHASERZ MONTROSE	QUICK FIX	28	119.00	154.00	35.00	23 %
CLOUD CHASERZ SHERIDAN	QUICK FIX	14	59.50	77.00	17.50	23 %
CLOUD CHASERZ OWASSO	QUICK FIX	14	59.50	77.00	17.50	23 %
MOMENTUM VAPE NOVELTY	QUICK FIX	112	476.00	560.00	84.00	15 %
SMOKE DREAMZZZZ OKMULGE	QUICK FIX	14	59.50	84.00	24.50	29 %
CLOUD CHASERZ MINGO 81ST	QUICK FIX	14	59.50	77.00	17.50	23 %
ELLA FOOD MART	QUICK FIX	3	12.75	16.50	3.75	23 %

Total Of Product = 674008320028	1190	\$5,057.50	\$5,595.50	538.00
---------------------------------	------	------------	------------	--------

DEFENDANT - 0005

782804427480

JOE SMOKE	QUICK FIX	42	178.50	231.00	52.50	23 %
NORTHEASTERN WHOLESALE	QUICK FIX	448	1,904.00	2,016.00	112.00	6 %
NUMBER 1 SMOKE SHOP	QUICK FIX	2	8.50	11.00	2.50	23 %
CLOUD CHASERZ 71ST	QUICK FIX	28	119.00	154.00	35.00	23 %
PRINCE WHOLESALE	QUICK FIX	672	2,856.00	3,024.00	168.00	6 %
CLOUD CHASERZ SHERIDAN	QUICK FIX	14	59.50	77.00	17.50	23 %
SMOKEY MOUNTAIN 1	QUICK FIX	3	12.75	15.00	2.25	15 %
BIGG BABA	QUICK FIX	14	59.50	70.00	10.50	15 %
Total Of Product = 782804427480		1223	\$5,197.75	\$5,598.00	400.25	

DEFENDANT - 0006